

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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JOSE RAMIREZ,
Petitioner,

v.

STEVEN J. O'BRIEN,
Respondent.

CIVIL ACTION NO. 03-40281-NMG
U.S. DISTRICT COURT
DISTRICT OF MASS.

**PETITIONER'S ASSENTED-TO MOTION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS PETITION FOR WRIT OF HABEAS CORPUS**

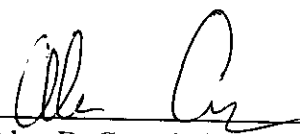
The Petitioner hereby requests that the Court extend the time within which he must file an opposition to the Respondent's Motion to Dismiss Petition for Writ of Habeas Corpus by fourteen days, to April 13, 2004. The Respondent's counsel has assented to the requested extension. In further support of this motion, the Petitioner states as follows:

1. Since being served with motion, counsel has been away from his office to attend court on four days and has missed another day to attend a full-day seminar for the CJA Appellate Panel.
2. Apart from causing counsel to be out of the office, the above-referenced court appearances required substantial time to prepare for. Accordingly, counsel has not been able to dedicate the time necessary to preparing a vigorous opposition to the Respondent's motion to dismiss.
3. The extension sought herein is required to research the cases relied on by the Respondent and prepare an appropriate opposition.
4. This request is in the interests of justice and will neither prejudice any of the parties nor burden the court.

5. Pursuant to L.R. 7.1(A)2), the undersigned counsel conferred with the Respondent's counsel, Natalie S. Monroe, by telephone on March 26, 2004. The Respondent's counsel agreed to the requested extension of time.

WHEREFORE, the present motion should be allowed and an order should enter allowing the Petitioner up to and including April 13, 2004 to file an opposition to Respondent's motion to dismiss.

Respectfully submitted,
JOSE RAMIREZ,
By his attorney,

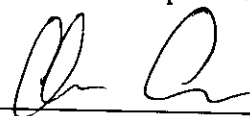


Alan D. Campbell
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Dated: March 26, 2004

Rule 7.1 Certification

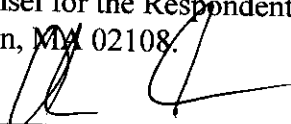
I hereby certify that I conferred with the Respondent's counsel, Natalie S. Monroe, by telephone on March 26, 2004. Ms. Monroe agreed to the relief requested in this motion.



Alan D. Campbell

Certificate of Service

I hereby certify that on March 26, 2004, I caused a copy of the above document to be served by first-class mail, postage prepaid, upon counsel for the Respondent, Natalie S. Monroe, AAG, Criminal Bureau, One Ashburton Place, Boston, MA 02108.



Alan D. Campbell